

FILED

FEB 08 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL ARDELL ROMANS,

Defendant.

Case No.

23CR059GKF

INDICTMENT

[COUNT ONE: 18 U.S.C.

§§ 922(b)(5) and 924(a)(1)(D) –

Failure of a Federal Firearms Dealer
to Keep Proper Records;

COUNT TWO: 18 U.S.C.

§§ 922(d)(1) and 924(a)(2) – Sale and
Disposition of a Firearm to a Felon;

COUNT THREE: 18 U.S.C.

§ 924(a)(3)(A) – False Statements
and Representations in Records of a
Federal Firearms Dealer

(Misdemeanor);

COUNT FOUR: 18 U.S.C.

§ 1512(c)(1) – Corruptly Altering a
Document and Concealing a
Record;

Forfeiture Allegation: 18 U.S.C.

§ 924(d) and 28 U.S.C. § 2461(c) –
Firearms Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§ 922(b)(5) and 924(a)(1)(D)]

From on or about June 7, 2020, to on or about December 19, 2020, in the Northern District of Oklahoma, **PAUL ARDELL ROMANS**, being a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, doing business as Romans, a/k/a “Romans Guns,” a/k/a “Paul’s Pistols,” willfully sold and delivered a firearm, a Glock, Model 44, .22 caliber pistol, serial number AEET901, without noting and keeping in the records of Romans, a/k/a

“Romans Guns,” a/k/a “Paul’s Pistols,” the name, age, and place of residence of the person to whom the firearm was delivered, as required by law pursuant to Title 18, United States Code, Section 923.

All in violation of Title 18, United States Code, Sections 922(b)(5) and 924(a)(1)(D).

COUNT TWO
[18 U.S.C. § 922(d)(1) and 924(a)(2)]

On or about April 2, 2022, in the Northern District of Oklahoma, **PAUL ARDELL ROMANS**, knowingly sold and otherwise disposed of a firearm, a Glock, Model 30, .45 caliber pistol, serial number FTV505, to John Doe, knowing and having reasonable cause to believe that John Doe had been convicted of a felony crime punishable by imprisonment for a term exceeding one year.

All in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT THREE
[18 U.S.C. § 924(a)(3)(A)]

On or about April 2, 2022, in the Northern District of Oklahoma, the defendant, **PAUL ARDELL ROMANS**, being a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, doing business as Romans, a/k/a “Romans Guns,” a/k/a “Paul’s Pistols,” knowingly made a false statement and representation with respect to information to be kept in the records of Romans, a/k/a “Romans Guns,” a/k/a “Paul’s Pistols,” as required by the provisions of Chapter 44 of Title 18, United States Code, in that **ROMANS** made and kept an ATF Form 4473, Firearms Transaction Record, which represented that H.J.L., a person known to the Grand Jury, was the actual buyer of a firearm when, in truth and fact, **ROMANS** knew and had reasonable cause to believe that John Doe, a convicted felon, was the actual buyer of the firearm.

All in violation of Title 18, United States Code, Section 924(a)(3)(A).

COUNT FOUR
[18 U.S.C. § 1512(c)(1)]

On or about April 2, 2022, in the Northern District of Oklahoma, the defendant, **PAUL ARDELL ROMANS**, knowingly and corruptly altered a document and concealed a record, and attempted to do so, with the intent to impair the document's integrity and availability for use in an official proceeding, by altering an ATF Form 4473, Firearms Transaction Record, to conceal the unlawful sale of a firearm, in that **ROMANS** made and kept an ATF Form 4473 representing that H.J.L., a person known to the Grand Jury, was the actual buyer of a firearm when, in truth and fact, **ROMANS** knew and had reasonable cause to believe that John Doe, a convicted felon, was the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(d)(1).

All in violation of Title 18, United States Code, Section 1512(c)(1).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Indictment, as a part of his sentence, the defendant, **PAUL ROMANS**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of such offenses. The property to be forfeited includes, but is not limited to:


FIREARMS AND AMMUNITION

1. A Smith & Wesson, Model 5946, 9mm caliber pistol, serial number VAS7073;
2. A Taurus, Model 856, .38 SPL caliber revolver, serial number ADC076405;
3. A Glock, Model 23. .40 caliber pistol, serial number BEUG076;
4. A North American Arms, Model Belt Buckle, .22MAG caliber revolver, serial number E460674;
5. A Ruger, Model EC9S, 9mm caliber pistol, serial number 461-66017;
6. A Phoenix Arms, Model HP22A, .22 caliber pistol, serial number 4584096;
7. An SCCY, Model CPX-2, 9mm caliber pistol, serial number C129450;
8. A Rock Island Armory, Model M1911A2FS TACT11, 10mm pistol, serial number RIA2524532;
9. A Charter Arms, Model Undercover, .38 SPL caliber revolver, serial number 21-73578;
10. A Beretta, Model 950-B, 6.35 caliber pistol, serial number G37755;

11. A Ruger, Model LCR, .38 caliber revolver, serial number 541-61658;
12. A Taurus, Model Poly Protector, .38 caliber revolver, serial number FR95042;
13. A Ruger, Model SP101, .357 MAG caliber revolver, serial number 573-88159;
14. A FIE, Model Standard, .38 caliber revolver, serial number ST02992;
15. A Sig, Model P365, 9mm caliber pistol, serial number 66B672311;
16. A Walther, Model P22, .22 caliber pistol, serial number WA326573;
17. An EAA, Model MC28, 9mm caliber pistol, serial number T6368-21AV01521;
18. An Anderson, Model AM-15, multi-caliber rifle, serial number 18264494; and
19. Any and all ammunition or magazines not specified.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

CLINTON J. JOHNSON
United States Attorney



NIKO BOULIERIS
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson